

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Global Brokerage, Inc. f/k/a FXCM Inc.  
Securities Litigation

Master File No. 1:17-cv-00916-RA-BCM

CLASS ACTION

This Document Relates To: All Actions

**DECLARATION OF MATTHEW SHILLADY  
ON IMPLEMENTATION OF CAFA NOTICE**

I, Matthew Shillady, declare and state as follows:

1. I am the Director of Operations of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over nineteen years of experience specializing in the administration of class action cases. I have personal knowledge of the facts set forth herein, and if called on to do so, I could and would testify competently thereto.
2. SCS was established in April 1999 and has administered over five hundred twenty-five (525) class action cases since its inception.

**CAFA NOTICE IMPLEMENTATION**

3. At the direction of counsel for the Individual Defendants Dror Niv and William Ahdout, 58 officials, which included the Attorney General of the United States and the Attorney Generals of each of the 50 states, the District of Columbia, and U.S. Territories, and the Securities and Exchange Commission were identified to receive the CAFA Notice. **Exhibit A** is a list of the 58 officials, along with their mailing addresses.

4. SCS maintains a list of these state and federal officials with contact information for the purpose of providing CAFA Notice.

5. On February 13, 2023, SCS mailed a notice of proposed class action settlement, pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 (“CAFA”), to the appropriate 58 federal and state officials listed in Exhibit A, by certified return receipt through the United States Postal Service.

6. The mailing consisted of a letter regarding the Settlement approved by Defense Counsel describing the mailing (“CAFA Letter”). Attached as **Exhibit B** is a copy of the CAFA Letter that SCS mailed. The CAFA Letter was accompanied by a CD-ROM containing copies of the following documents:

- a. Class Action Complaint for Violations of the Federal Securities Laws and three (3) Amended Consolidated Securities Class Action Complaints filed in the action;
- b. A copy of the parties’ Stipulation and Agreement of Settlement (with exhibits) (“Stipulation”); and
- c. Forms of Notice (Long Notice – Exhibit A-1 to the Stipulation, Summary Notice – Exhibit A-3 to the Stipulation, and Postcard Notice – Exhibit A-4 to the Stipulation).

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 22<sup>nd</sup> day of February 2023, in Media, Pennsylvania.



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Matthew Shillady

Name	Title	Address 1	Address 2	Address 3	City	State	Zip
Steve Marshall	Office of the Attorney General	PO Box 300152			Montgomery	AL	36130-0152
Treg Taylor	State of Alaska Department of Law Attorney General	PO Box 110300			Juneau	AK	99811-0300
Fainu'uilei Alailima-Utu	Attorney General	American Samoa Gov't, Exec. Ofc. Bldg	P.O. Box 7		Utulei	AS	96799
Kris Mayes	Arizona Attorney General	2005 N Central Ave			Phoenix	AZ	85004-2926
Tim Griffin	Arkansas Attorney General	323 Center St	Suite 200		Little Rock	AR	72201-2610
Rob Bonta	Office of the Attorney General	CAFA Coordinator - Consumer Law Section	455 Golden Gate Ave	Suite 11000	San Francisco	CA	94102
Phil Weiser	Attorney General	1300 Broadway	10th Fl		Denver	CO	80203
William Tong	Office of the Attorney General	55 Elm St			Hartford	CT	06106
Brian Schwalb	Office of the Attorney General	441 4th St, NW	Suite 1100S		Washington	DC	20001
Kathy Jennings	Attorney General	Carvel State Office Bldg.	820 N. French St.		Wilmington	DE	19801
Ashley Moody	Florida Office of the Attorney General	The Capitol	PL 101		Tallahassee	FL	32399-1050
Christopher Carr	Attorney General of Georgia	Office of the Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
Doug Moylan	Attorney General	ITC Building	590 S. Marine Corps Dr	Suite 706	Tamuning	Guam	96913
Holly Shikada	Department of the Attorney General	425 Queen St.			Honolulu	HI	96813
Raul Labrador	Office of the Attorney General	700 W. Jefferson St	PO Box 83720		Boise	ID	83720-1000
Kwame Raoul	Illinois Attorney General	100 W. Randolph St			Chicago	IL	60601
Todd Rokita	Office of the Indiana Attorney General	302 W Washington St	5th Floor		Indianapolis	IN	46204
Brenna Bird	Office of the Attorney General	1305 E Walnut St			Des Moines	IA	50319
Kris Kobach	Attorney General	120 SW 10th Ave., 2nd Fl.			Topeka	KS	66612-1597
Daniel Cameron	Office of the Attorney General	700 Capitol Ave	Capitol Building, Ste. 118		Frankfort	KY	40601
Jeff Landry	Office of the Attorney General	PO Box 94095			Baton Rouge	LA	70804-4095
Aaron Frey	Office of the Maine Attorney General	6 State House Station			Augusta	ME	04333
Anthony Brown	Maryland Attorney General	200 St. Paul Pl.			Baltimore	MD	21202-2202
Andrea Campbell	Attorney General	1 Ashburton Pl.			Boston	MA	02108-1698
Dana Nessel	State of Michigan Attorney General	G. Mennen Williams Building, 7th Fl	525 W Ottawa St.	PO Box 30212	Lansing	MI	48909
Keith Ellison	Office of the Attorney General	1400 Bremer Tower	445 Minnesota St.		St. Paul	MN	55101-2131
Lynn Fitch	Office of the Attorney General State of Mississippi	PO Box 220			Jackson	MS	39205
Andrew Bailey	Missouri Attorney General	PO Box 899			Jefferson City	MO	65102
Austin Knudsen	Montana Department of Justice Attorney General	PO Box 201401			Helena	MT	59620-1401
Mike Hilgers	Nebraska Attorney General	2115 State Capitol	PO Box 98920		Lincoln	NE	68509
Aaron Ford	Nevada Attorney General	100 N. Carson St.			Carson City	NV	89701
John Formella	Office of the Attorney General	NH Department of Justice	33 Capitol St.		Concord	NH	03301-6397
Matt Platkin	Office of the Attorney General	Richard Hughes Justice Complex	25 Market Street	PO Box 080	Trenton	NJ	08625-0080
Raul Torrez	Office of the New Mexico Attorney General	PO Drawer 1508			Santa Fe	NM	87504-1508
Letitia James	Attorney General	Office of the Attorney General	The Capitol		Albany	NY	12224
Josh Stein	North Carolina Department of Justice Attorney General	9001 Mail Service Center			Raleigh	NC	27699
Drew Wrigley	North Dakota Attorney General	State Capitol	600 E Boulevard Ave., Dept. 125		Bismarck	ND	58505-0040
Edward Manibusan	Attorney General	Administration Building	P.O. Box 10007		Saipan	MP	96950-8907
Dave Yost	Ohio Attorney General	30 E Broad St, 14th Floor			Columbus	OH	43215
Gentner Drummond	Oklahoma Office of the Attorney General	313 NE 21st St.			Oklahoma City	OK	73105
Ellen Rosenblum	Oregon Department of Justice Attorney General	Oregon Department of Justice	1162 Court St. NE		Salem	OR	97301
Michelle Henry	Pennsylvania Attorney General	16th Floor, Strawberry Sq.			Harrisburg	PA	17120
Domingo Emanuelli	Puerto Rico Attorney General	PO Box 9020192			San Juan	PR	00902-0192
Peter Neronha	Office of the Attorney General	150 S Main St.			Providence	RI	02903
Alan Wilson	South Carolina Attorney General	PO Box 11546			Columbia	SC	29211-1549
Marty Jackley	Office of the Attorney General	1302 E Hwy 14, Suite 1			Pierre	SD	57501-8501
Jonathan Skrmetti	Office of the Attorney General	PO Box 20207			Nashville	TN	37202
Ken Paxton	Attorney General of Texas	PO Box 12548			Austin	TX	78711-2548
Carol Thomas-Jacobs	Attorney General	34-38 Kronprindsens Gade	GERS Building, 2nd Floor		St. Thomas	Virgin Islands	00802
Sean Reyes	Office of the Attorney General	PO Box 142320			Salt Lake City	UT	84114-2320
Charity Clark	Office of the Attorney General	109 State St.			Montpelier	VT	05609-1001
Jason Miyares	Attorney General of Virginia	900 E Main St			Richmond	VA	23219
Bob Ferguson	Washington State Office of the Attorney General	1125 Washington St. SE	PO Box 40100		Olympia	WA	98504-0100

Patrick Morrisey	Office of the West Virginia Attorney General	State Capitol Complex	Bldg. 1, Room E-26	Charleston	WV	25305
Josh Kaul	Wisconsin Department of Justice Attorney General	State Capitol, Ste 114 E	PO Box 7857	Madison	WI	53707-7857
Bridget Hill	Wyoming Attorney General	Pioneer Building, 4th Floor	2424 Pioneer Avenue	Cheyenne	WY	82002
Gary Gensler	Chairman	100 F Street, NE		Washington	DC	20549
The Honorable Merrick B. Garland	Attorney General of the United States	U.S. Department of Justice	950 Pennsylvania Avenue, NW	Washington	DC	20530



Phone 866.274.4004  
610.565.9202  
Fax 610.565.7985  
strategicclaims.net

February 13, 2023

**VIA CERTIFIED MAIL**

The Honorable Merrick B. Garland  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

RE: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715 –  
*In re Global Brokerage, Inc. f/k/a FXCM Inc. Securities Litigation*, Master File No.: 1:17-cv-00916-RA-BCM

Dear Sir or Madam:

Strategic Claims Services has been retained to administer the proposed class action settlement in a federal securities lawsuit pending in the United States District Court for the Southern District of New York *In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation*, Master File No. 1:17-cv-00916-RA-BCM (S.D.N.Y.). The plaintiffs filed a motion for preliminary approval of a class action settlement on February 3, 2023. In compliance with Section 1715 of the Class Action Fairness Act, 28 U.S.C. §§ 1332(d), 1453, and 1711–1715 (CAFA), this letter is to advise you of that proposed class action settlement. As of this writing, the Court has not yet ruled on the motion for preliminary approval.

The Defendants deny any and all wrongdoing, deny any liability to plaintiffs or to the proposed settlement class, and deny that plaintiffs and the proposed class members have suffered any damages attributable to the Defendants' actions.

In compliance with Section 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** A copy of the complaint and amended complaints filed in the action are provided on the enclosed CD ROM.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The Court has not scheduled a hearing on preliminary approval, or for final approval, as of this writing.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** A copy of the *Notice* is enclosed on the CD ROM entitled “*Stipulation Ex. A-1 - Long Notice*,” “*Stipulation Ex. A-3 - Summary Notice*,” and “*Stipulation Ex. A-4 - Postcard Notice*.”
4. **28 U.S.C. § 1715(b)(4) – Proposed Class Action Settlement:** A copy of the parties’ *Stipulation and Agreement of Settlement* with Exhibits is provided on the enclosed CD ROM.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties also contemporaneously agreed to a confidential *Supplemental Agreement*, which is referred to in the *Stipulation and Agreement of Settlement* and which was not filed with the Court. As described in the *Stipulation*, and as is customary in securities class action settlements, the purpose of the confidential *Supplemental Agreement* is to provide the Defendants with the option to terminate the Settlement if timely requests for exclusion from the settlement class are submitted by eligible settlement class members that meet the conditions set forth in the *Supplemental Agreement*. The *Supplemental Agreement* remains confidential and has not been included with the enclosed materials. The parties represent that they will provide your office with a copy of the *Supplemental Agreement* upon request.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** As of the date of this letter, no final judgment has been issued by the Court.

7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimated Proportionate Share:** Pursuant to 28 U.S.C. § 1715(b)(7)(A), CAFA also requires a defendant, “if feasible,” to provide the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement or (B) if the provision of information under subparagraph (A) is not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement. Because most of the securities at issue are held in “street name,” it is not feasible to provide the names of settlement class members who reside in each state, or to provide the estimated proportionate share of the claims of such members to the settlement. For the same reason, it is not feasible to provide a reasonable estimate of the number of settlement class members residing in each state or the estimated proportionate share of the claims of such members to the settlement.
8. **28 U.S.C. § 1715(b)(8) – Written Judicial Opinions:** There are no written judicial opinions relating to the materials described in 28 U.S.C. § 1715(b) subparagraphs (3) through (6) at this time.

If for any reason, you believe the enclosed information does not fully comply with Section 1715, please contact the Counsel for Defendants identified below, to address any concerns or questions that you may have.

**Counsel for Defendants**

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Sincerely,

Strategic Claims Services

By: Matthew Shillady

Title: Director of Operations

Enclosure – CD ROM